

JOSEPH ONEBANE (1917-1987)  
JOHN G. TORIAN, II (1936-1991)

TIMOTHY J. MCNAMARA  
EDWARD C. ABELL, JR.  
LAWRENCE L. LEWIS, III †  
ROBERT M. MAHONY  
DOUGLAS W. TRUXILLO \*  
RANDALL C. SONGY  
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JOAN LABBE BOUDREAUX  
JASMINE B. BERTRAND  
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JAMES D. BAYARD

# ONEBANE LAW FIRM

*A Professional Corporation*

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October 26, 2006

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MARK B. OLIVER

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#### BATON ROUGE OFFICE

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† BOARD CERTIFIED TAX ATTORNEY  
LL.M. IN TAXATION  
†† REGISTERED PATENT ATTORNEY

\* ALSO ADMITTED IN TEXAS  
\*\* ALSO ADMITTED IN MISSISSIPPI

### VIA FACSIMILE (225) 342-2584 & U. S. MAIL

1282-65696

Mr. Todd Keating  
Louisiana Office of Conservation  
617 North Third Street  
Baton Rouge, LA 70802

Re: 19,000' Tuscaloosa Zone, Reservoir K  
Morganza Field  
Pointe Coupee Parish, Louisiana

Dear Todd:

Enclosed are duplicate originals of a corrected Page 1 of the Application which we spoke about earlier, which we would request be substituted for Page 1 of the filing which was sent on October 19, 2006.

Very truly yours,

  
Randall C. Songy

RCS:bad

Enclosure

JOSEPH ONEBANE (1917-1987)  
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October 19, 2006

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## APPLICATION

1282-65696

Honorable James H. Welsh  
Commissioner of Conservation  
Louisiana Office of Conservation  
P.O. Box 94275  
Baton Rouge, Louisiana 70804

Re: 19,000' Tuscaloosa Zone, Reservoir K  
Morganza Field  
Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **ENERGY PRODUCTION CORPORATION** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters related to the **19,000' Tuscaloosa Zone, Reservoir K**, in the **Morganza Field**, Pointe Coupee Parish, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for the exploration for and production of gas and condensate, such unit to be designated 19000 TUSC RK SUA;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To provide that any future wells drilled to the 19,000' Tuscaloosa Zone, Reservoir K, should be located in accordance with the spacing provisions of Statewide Order No. 29-E;

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October 19, 2006

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## APPLICATION

1282-65696

Honorable James H. Welsh  
Commissioner of Conservation  
Louisiana Office of Conservation  
P.O. Box 94275  
Baton Rouge, Louisiana 70804

Re: 19,000' Tuscaloosa Zone, Reservoir K  
Morganza Field  
Pointe Coupee Parish, Louisiana

NOTICE IS HEREBY GIVEN that **ENERGY PRODUCTION CORPORATION** plans to apply to the Commissioner of Conservation for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters related to the **19,000' Tuscaloosa Zone, Reservoir K**, in the **Morganza Field**, Pointe Coupee Parish, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for the exploration for and production of gas and condensate, such unit to be designated 19000 TUSC RK SUA;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To provide that any future wells drilled to the 19,000' Tuscaloosa Zone, Reservoir K, should be located in accordance with the spacing provisions of Statewide Order No. 29-E;

4. To provide that the Commissioner of Conservation should be authorized to reclassify the 19,000' Tuscaloosa Zone, Reservoir K, by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and
5. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

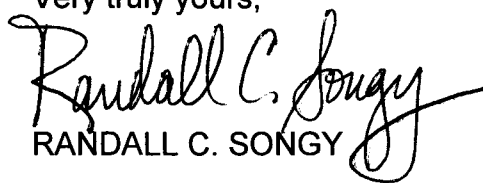
The 19,000' Tuscaloosa Zone, Reservoir K, in the Morganza Field, Pointe Coupee Parish, Louisiana, is hereby defined as that gas and condensate bearing zone encountered between the depths of 18,860 feet and 19,623 feet (electrical log measurements), in the BP America Production Co. - F&L Planters No. 4 Well, located in Section 76, Township 4 South, Range 8 East, Pointe Coupee Parish, Louisiana.

A conference to discuss the proposed application and any opposition thereto was held at 10:30 a.m. on the 18<sup>th</sup> day of October, 2006, at the Onebane Law Firm, 1200 Camellia Blvd., Suite 300, Lafayette, Louisiana 70508, (337) 237-2660. A list of the parties who attended the pre-application conference is attached. Randall C. Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedures. Frank W. Harrison, Jr., geological consultant for the applicant, explained the applicant's proposal and the geological, engineering and other bases therefore, and answered questions. A counterplan was presented by Joe Adams, geological consultant representing J.B. Hanks, et al. No resolution of the differences was reached, and the conference was adjourned.

Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting **Frank W. Harrison, Jr., 200 Audubon Blvd., Lafayette, LA 70503, (337)232-4031.**

There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$755.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,  
  
RANDALL C. SONGY

RCS/elg/bad

Enclosures

cc: Mr. Richard Hudson, District Manager  
Office of Conservation

Interested Owners, Represented Parties and  
Interested Parties

**P.S. To all Interested Owners, Represented Parties and Interested Parties:**

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed unit.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.

R 8 E

8

9

19000 TUSC RE SUB  
1102-B-5

51

52

50

AMOCO

Ravenswoods "B" No. 1

EPCO

Plantation Partnership 77

PRESENT  
UNIT WELL

GEORGE G.  
LACOUR, JR., ET AL

AMOCO

G G LACOUR

AMOCO

G.G. Lacour

1

2

13000

19000 TUSC RK SUA  
UNDRILLED  
±1280 ACRES

19000 TUSC RA  
1102-B-2

RS 19239

8800'

77

R-8-E  
T-4-S, R-8-E

DNR

35

SILVER MOUNT  
CORPORATION, ET AL

GEORGE G.  
LACOUR, JR., ET AL

CHEVRON  
DEBETAZ



20500

PENNINGTON  
F. LACOUR



19193

AMOCO  
O. E. LACOUR



19800

19000 TUSC RI SUA  
1102-B-12

43

BTA  
Debetaz



19550'

AMOCO  
Fortaine



20944'

42

AMOCO  
RAVENSWOOD



19507

PENNINGTON  
LABARRE PLANTA



20250



20250

41

PENNINGTON  
Labarre 0 2

19000 TUSC RH SUA  
1102-B-11

45

PENNINGTON  
1 Lichtenberg

PENNINGTON



20593



21032

46

19000 TUSC

EXHIBIT NO.  
DOCKET NO. 06-

ENERGY PRODUCTION  
CORPORATION

MORGANZA FIELD  
POINTE COUPEE PARISH, LOUISIANA

PROPOSED UNIT  
19000' TUSCALOOSA SAND

0' 2000' 4000'

DATE:

FRANK W. HARRISON, JR.  
CONSULTING GEOLOGISTS - LAFAYETTE, LOUISIANA